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18 *Sanofi-Aventis U.S. LLC, Sanofi US Services Inc.,*
19 *and Sanofi-Synthelabo Inc.*

20 [Additional Counsel Listed At Signature Page]

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 DOLLY SANDERS *et al.*,

25 Plaintiff,

26 v.

27 BRISTOL-MYERS SQUIBB COMPANY,
28 SANOFI-AVENTIS U.S. LLC., SANOFI-
AVENTIS U.S., INC., SANOFI-
SYNTHELABO, INC., MCKESSON
CORPORATION, and DOES 1 to 100,

Defendants.

No. 14-2652 ~~EDL~~ RS

**JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY
LITIGATION PENDING TRANSFER TO
THE PLAVIX® MDL**

Judge: ~~Hon. Elizabeth D. Laporte~~

1 This Joint Stipulation is made by and between Plaintiffs in *Sanders et al. v. Bristol-Myers*
 2 *Squibb Co. et al.*, No. CV-14-2652 EDL (N.D. Cal.), and Defendants Bristol-Myers Squibb
 3 Company, Sanofi-Aventis U.S. LLC, Sanofi US Services Inc., and Sanofi-Synthelabo Inc.,¹
 4 (collectively “Defendants”), by and through the undersigned counsel of record, with reference to the
 5 following facts:

6 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation
 7 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to
 8 Judge Freda Wolfson;

9 2. WHEREAS, on June 6, 2014, Plaintiffs filed the *Sanders* action in the Superior
 10 Court of California, San Francisco County;

11 3. WHEREAS, on June 9, 2014, the *Sanders* action was removed to this Court by
 12 Defendants;

13 4. WHEREAS, on June 11, 2014, Defendants tagged this case for transfer to the
 14 Plavix® MDL and anticipates that the JPML will finalize a conditional transfer order for this case
 15 soon; and

16 5. WHEREAS, the Parties agree that the *Sanders* action should be stayed pending its
 17 anticipated transfer to the Plavix® MDL in the District of New Jersey.

18
 19 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s
 20 approval, that the *Sanders* action should be stayed pending its anticipated transfer to the Plavix®
 21 MDL in the District of New Jersey.

22
 23 **IT IS SO STIPULATED.**
 24
 25

26
 27 ¹ Sanofi-Aventis U.S. LLC was incorrectly designated as “Sanofi-Aventis U.S. LLC,” Sanofi-
 28 Aventis U.S. Inc. was incorrectly designated as “Sanofi-Aventis U.S., Inc.,” and Sanofi-Synthelabo
 Inc. was incorrectly designated as “Sanofi-Synthelabo, Inc.” in the Complaint. As of June 11, 2012,
 Sanofi-Aventis U.S. Inc. changed its name to Sanofi US Services Inc.

1 Dated: June 20, 2014

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7
8 By: /s/ Joshua C. Ezrin
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9 *Attorney for Plaintiffs*

10
11 Dated: June 20, 2014

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14 By: /s/ Sharon D. Mayo
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16 *Attorneys for Defendants Bristol-Myers Squibb*
17 *Company, Sanofi-Aventis U.S. LLC, Sanofi US*
18 *Services Inc., and Sanofi-Synthelabo Inc.*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20
21
22 Date: 6/23/14



23 ~~Judge Elizabeth D. Laporte~~ Judge Richard Seeborg
24 ~~U.S. Magistrate Judge~~ U.S. District Judge